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May 23, 2019

Honorable James L. Garrity, Jr.
United States Bankruptcy Court
Southern District of New York
One Bowling Green
New York, NY 10004-1408

Re: Penny Ann Bradley, Chapter 11, Case No. 18-10122(JLG)

Hon. Judge Garrity:

This letter is written to update the Court of the status of the above-referenced Chapter 11 case.

Since the last hearing before the Court on April 11, 2019, the following developments have transpired:

- the Debtor appeared for the Meeting of Creditors pursuant to §341(a) of the Bankruptcy Code on April 16, 2019. The meeting was closed by the U.S. Trustee, but a request was made for the Debtor to provide certain documents to the U.S. Trustee, and the Debtor must also file Amended Schedules. The Debtor intends to provide the balance of the documents and amend her Schedules upon completion of the matters she is addressing with her accountant, as further described below. The U.S. Trustee has adjourned the Debtor's Initial Debtor Interview, pending receipt of the remaining documents.
- on May 2, 2019, the Debtor filed an application to retain Klinger & Klinger, LLP ("Accountants") as accountants for the Debtor [Docket No. 92], which was approved by the Court [Docket No. 93]. The Debtor has met with the Accountants on numerous instances since the last hearing and, together, they have been diligently working on preparing the Debtor's tax returns for 2016 (to be amended), 2017, and 2018, as well as the Debtor's Monthly Operating Reports for the Chapter 11 period. In order to prepare the aforementioned, it has been necessary to do a comprehensive review of the books and records of each of the Debtor's affiliated entities and the Debtor's personal books and records, which has been a substantial undertaking. The Debtor anticipates that the tax returns and Monthly Operating Reports will be completed within the next several business days.
- on April 29, 2019, the Debtor provided the initial production of documents to Atlas Union Corp. ("Atlas") and NSM82, LLC ("NSM82"), in response to their Bankruptcy

Rule 2004 document demands. Many of the documents that remain to be produced are related to the documents that the Debtor and Accountant are working on and can not be produced until the Debtor and Accountant have completed the comprehensive review of the Debtor's and affiliates' books and records. Due to this, the parties agreed to postpone the Debtor's examinations pursuant to Bankruptcy Rule 2004, to be rescheduled upon completion of document production.

Based upon the foregoing, and the Debtor's good faith efforts to comply with document production and with U.S. Trustee requirements, it is respectfully requested that the Debtor's Motion to Dismiss, which is currently scheduled for May 30, 2019 at 10:00 a.m., be adjourned for a period of approximately thirty days. The U.S. Trustee, as well as creditors, Russell and Lydia Pollack, have consented to an adjournment, subject to Court approval. Counsel for Atlas has advised that Atlas takes no position with regard to the Debtor's request for an adjournment. The Debtor has not received any response from several emails sent to NSM82 and therefore assumes that NSM82 has no objection to the Debtor's request for an adjournment.

If the Court wishes, I will be pleased to submit any further status updates at such times as the Court may direct.

Respectfully,
/s/ Daniel S. Alter
Daniel S. Alter, Counsel for the Debtor

cc: Serene Nakano, Esq. (via email only)
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